

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In re:)	
)	
Public Notice DA 05-1661)	
In-Band/On Channel Digital Radio)	
Broadcasting Standard NRSC-5)	MM Docket No. 99-325

TO: Secretary, Federal Communications Commission

COMMENTS

I am an independent, medium market broadcaster from Beaumont, TX. My stations are located close enough to each other physically (20 miles) and on the spectrum (1340 and 1380 Mhz), that if I was mandated to use the ibiquity system I would interfere with myself.

In response to the FCC's call for input on allowing the ibiquity system of implementing In Band, On Channel (IBOC) Digital Stereo transmission and reception on the AM band:

1. The ibiquity system is flawed technically. If it receives FCC approval for full time broadcast, this action will further exacerbate the interference problems on the AM band. Ibiquity equipped stations are generating interference even from daytime only operation. KHNC, 1360 kHz in Colorado, had significant encroachment on their signal from an ibiquity equipped PBS station (20 kHz away on the AM band). Stories like theirs will quickly become epidemic if this flawed system is allowed the tacit endorsement of the FCC by its approval of full time operation of ibiquity systems. Ibiquity reduces coverage, imposes a delay, greatly increases co-channel and co-adjacent channel interference, and when it is fully implemented will result in an important medium being made un-listenable.
2. The FCC's endorsing this system by allowing it would make me wonder how objective the commission really is in fulfilling its mandate for action in the public interest.

3. The commission is considering what amounts to a gross breach of public trust in considering this action, since it will result in the further degrading of the AM band, the aural service most important as the medium of information and news for the majority of the public, at a time of crisis in our nation.
4. Ibiquity's system for achieving AM stereo is not truly "in-band", since its use would allow my neighbors to encroach on the bandwidth that has been assigned to existing broadcasters, even in daylight only use.
5. Changing the technical standards to allow this ibiquity system is tantamount to endorsing an inferior system. This action you are considering is made far worse, in that there is another system, far superior to ibiquity's, that operates well within the allotted spectrum for AM broadcasters, and has been demonstrated to extend the coverage of AM even broadcasting digital information, REDUCE off channel interference, and do so without requiring huge equipment purchases and licensing agreements. I know this from personal experience, since I have this Kahn CAMD system installed on my two stations now, running 24 hours a day, well within the NRSC limits currently allowed.

In my estimation, this is a sort of modern range war, with the FCC playing circuit judge. A huge combine is coming to town, and it is moving the fences of existing property owners, with the permission of the sheriff. The impact of this encroachment would be worsened by the FCC rubber stamping this action by saying "we will change the laws to allow fences to be moved, to make room for the combine's operation. We declare this is to be done in the name of an enhancement to ranching, (maybe they'd call it "digital" ranching in this metaphor, and certainly major moneyed interests would be enhanced by the change)".

In this "new west" the FCC is considering allowing, all the old cows would no longer be naturally edible. Ranchers would have to slaughter their existing stock and only raise the new cattle they would have to buy the rights to from the combine. The new cattle would be smaller, and much less robust. A

fee would be forced to be paid when every cow is born. And believe it or not, every person that might eat meat from these cows would have to buy their stoves and cooking utensils from the combine, to be able to consume the new product. So the combine bandits are making money coming and going, and shutting out all competition, with the help of the corrupt “local” law enforcement.

It is my most sincere hope that in the end, the FCC rides into town wearing the white hats we think of them wearing. They work to restore order, and improve ranching, without destroying the status quo, and provide even more product for the public to consume without disruption.

Respectfully submitted,

VOICE IN THE WILDERNESS BROADCASTING, INC.

By _____
Ralph McBride
President